

09:27:50 1 A. Right.

09:27:50 2 Q. And there you managed the build-out of a

09:27:53 3 two-node SONET ring for ASI to serve the VA Hospital,

09:27:57 4 correct?

09:27:57 5 A. Right.

09:27:58 6 Q. What's another example?

09:28:00 7 A. I'm trying to remember the next one I had.

09:28:06 8 Q. Let me stop you right there and finish up the

09:28:09 9 VA Hospital before I forget.

09:28:11 10 A. Okay.

09:28:12 11 Q. I'll forget. Trust me.

09:28:14 12 In that situation. With the VA Hospital

09:28:19 13 in Houston, ASI had sold a two-node SONET ring to the VA

09:28:26 14 Hospital, correct?

09:28:27 15 A. No. No. Southwestern Bell global markets

09:28:32 16 sold a DS3 plus four DS1s that required a build-out of a

09:28:37 17 SONET ring to provide the facilities.

09:28:40 18 Q. Okay. How is ASI involved?

09:28:44 19 A. They go through a web link to order the

09:28:47 20 service and the orders come back into the network with

09:28:50 21 their name on it.

09:28:53 22 Q. ASI does?

09:28:55 23 A. Yes.

09:28:55 24 Q. Now, is global markets part of ASI?

28:58 25 A. No.

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09:28:59 1 Q. Global markets is part of SWBT or SBC?

29:02 2 A. It's SBC.

09:29:03 3 Q. It's SBC?

09:29:05 4 A. Yes.

09:29:07 5 Q. So global markets is part of SBC?

09:29:10 6 A. Right.

09:29:11 7 Q. Okay. So I'm confused. Now -- but you say

09:29:18 8 your paycheck comes from Southwestern Bell Telephone?

09:29:20 9 A. That's what's on the check.

09:29:22 10 Q. And I know how that goes. I've had that

09:29:25 11 problem myself.

09:29:27 12 MR. HARTLEY: You've got checks from

09:29:29 13 Southwestern Bell?

09:29:30 14 MR. CRAWFORD: No. Unfortunately, I

09:29:32 15 write checks to Southwestern Bell. It goes the other

09:29:35 16 way.

09:29:36 17 MR. HARTLEY: That's the way we like it.

09:29:38 18 MR. CRAWFORD: It goes the other way.

09:29:43 19 Q. Okay. And so pardon me for being dense here.

09:29:47 20 So if one of your global markets sales guys went in and

09:29:51 21 sold these circuits to the VA Hospital, help me

09:29:56 22 understand how ASI is involved.

09:30:00 23 A. The CC would issue a request and we refer to

09:30:05 24 it as a COIS form. It's a request form to ASI for the

30:11 25 service. We have to give them all the information on

09:30:13 1 that form. It's transmitted to them. They issue their  
09:30:21 2 order.

09:30:22 3 Q. ASI does?

09:30:24 4 A. ASI does. ASI submits it to our ASC, which is  
09:30:29 5 our access service center.

09:30:31 6 Q. Right.

09:30:31 7 A. Our access service center then issues a  
09:30:36 8 Southwestern Bell order with ASI's name and the customer  
09:30:39 9 name on it and provisions that order.

09:30:41 10 Q. I'm sorry. The access service center then  
09:30:44 11 issues what?

09:30:45 12 A. A Southwestern Bell order, a SWBT order, which  
09:30:50 13 has ASI's name and the customer on there.

09:30:54 14 Q. And I guess that order makes it look like ASI  
09:30:57 15 is the customer --

09:30:58 16 A. Yes.

09:30:58 17 Q. -- because ASI's the ordering party, correct?

09:31:02 18 A. Yes, but the billing goes to global accounts.

09:31:05 19 Q. The customer writes a check to global markets?

09:31:07 20 A. Right.

09:31:10 21 Q. Okay. So global markets got the customer  
09:31:12 22 order, but then they -- they then used ASI to fulfill  
09:31:17 23 the order for themselves?

09:31:18 24 A. Correct.

09:31:19 25 Q. Okay. So ASI is the ordering party to the

09:31:22 1 SWBT access service center?

09:31:24 2 A. Right.

09:31:24 3 Q. So they act like just any other CLEC by  
09:31:27 4 placing an order with the access service center; is that  
09:31:30 5 correct?

09:31:30 6 A. Yes.

09:31:31 7 Q. It then travels through the system with ASI  
09:31:36 8 acting as the ordering party for the SWBT circuit?

09:31:39 9 A. Right.

09:31:41 10 Q. At that point, once the build-out was  
09:31:52 11 confirmed -- well, in that situation it was clear that  
09:32:03 12 based on the ASI order, a SONET ring needed to be  
09:32:07 13 constructed for the --

09:32:09 14 A. Correct.

09:32:10 15 Q. Okay. And that's how you were involved as the  
09:32:12 16 project manager overseeing the creation of that SONET  
09:32:15 17 ring to provide the circuits ordered by the VA Hospital?

09:32:20 18 A. When the facility check was made by NSS, it  
09:32:25 19 was verified that the facility wasn't there for that  
09:32:28 20 service --

09:32:29 21 Q. Right.

09:32:29 22 A. -- that was requested, and that's where the --  
09:32:34 23 they would have to do a go letter or a kick-off meeting  
09:32:38 24 to have all parties involved.

09:32:42 25 Q. Is that when NSS does their funded/not funded

09:32:46 1 analysis?

09:32:47 2 A. Right.

09:32:50 3 Q. The access service center, who do they send

09:32:53 4 the ASI order to?

09:32:55 5 A. It flows in SORD, just like all the other

09:32:58 6 orders do, but comes across the TIRKS.

09:33:04 7 Q. It goes to TIRKS?

09:33:06 8 A. Uh-huh.

09:33:06 9 Q. It goes to another sales person?

09:33:10 10 A. No.

09:33:10 11 Q. It goes straight from SORD to who?

09:33:12 12 A. It goes into the TIRKS system. It transfers

09:33:14 13 to the TIRKS system and they pick it up from there and

09:33:19 14 they provision it and send it back out the door to be

09:33:20 15 worked.

09:33:20 16 Q. The access service center, using SORD and

09:33:25 17 TIRKS, sends the request to NSS?

09:33:29 18 A. No.

09:33:30 19 Q. When the access service center puts it in the

20 system, who looks at it next to fill it out of the

21 system to analyze it?

09:33:31 22 A. TIRKS.

09:33:32 23 Q. TIRKS is a database?

09:33:34 24 A. Well, somebody in CPC, that's the only people

25 that touch that -- touch it as far as being able to be

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1 a --

2 Q. What's the CPC?

09:33:41 3 A. Circuit provisioning.

09:33:43 4 Q. So circuit provisioning looks at it and once  
09:33:45 5 they determine that some type of network augmentation is  
09:33:48 6 needed --

09:33:49 7 A. No. They don't determine augmentation, all  
09:33:51 8 they do is work the order based on previous meeting.

09:33:54 9 Q. Who does the circuit provisioning center then  
09:33:57 10 send the ASI request to to determine whether or not it's  
09:34:01 11 fulfillable?

09:34:04 12 A. They -- the process comes in, the  
09:34:08 13 interoffice -- current planners put a routing on the --  
09:34:13 14 in the database that comes back to the CPC. CPC uses  
09:34:18 15 that routing and they basically order the plugs that's  
09:34:21 16 required to send it out. The caveat is the new ring  
09:34:26 17 that we have mentioned before would have to be in place  
09:34:28 18 for them to do that or the order sits there until that  
09:34:31 19 facility is able to build it.

09:34:33 20 Q. Right. How does CPC let somebody know that a  
09:34:36 21 ring is necessary?

09:34:39 22 A. They don't. It comes from me, because I'm the  
09:34:42 23 one coordinating the project.

09:34:43 24 Q. If CPC is sitting on the order, how do you  
34:47 25 even know about the ASI order?

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09:34:49 1 A. Because I've told CC to issue the order to the  
34:53 2 COIS form to get the order moving. I don't have them  
09:34:57 3 release the order until the ring is being built.

09:35:02 4 Q. Okay.

09:35:03 5 A. That's why -- I'm the traffic cop. I tell --  
09:35:05 6 I don't want the order in the system before it's --

09:35:08 7 Q. Okay.

09:35:09 8 A. -- needed.

09:35:09 9 Q. And part of that makes sense. I was trying to  
09:35:12 10 get the process flow-through.

09:35:14 11 A. Uh-huh.

09:35:14 12 Q. If you're telling me -- in the VA Hospital  
09:35:17 13 example, ASI put their order into the access service  
09:35:22 14 center?

09:35:22 15 A. Only because we requested -- only because the  
09:35:25 16 CC and global accounts requested it.

09:35:27 17 Q. What's the CC?

09:35:28 18 A. Communication consultant for the, say, VA  
09:35:32 19 Hospital or any other account. She sends that request  
09:35:36 20 in to ASI and they generate that order. They won't do  
09:35:41 21 anything until someone requests them to issue the order.  
09:35:45 22 They don't issue the orders on their own behalf.

09:35:48 23 Q. So the communications consultant at global  
09:35:52 24 markets --

35:52 25 A. Right.

09:35:53 1 Q. -- they're the ones that made the sale to the  
09:35:57 2 VA Hospital?

09:35:57 3 A. No, no. The account manager did the -- or the  
09:36:02 4 account manager or his delegated person would have made  
09:36:06 5 that sale or that contract and the CC -- the one that  
09:36:12 6 attends my meeting would take direction from me to when  
09:36:16 7 to issue the order, not before, or I have to go back and  
09:36:23 8 have dates changed to make that match.

09:36:26 9 Q. Okay. When -- and is it SBC global markets,  
09:36:32 10 is that the proper name?

09:36:33 11 A. No, we don't use the SBC in front of it at  
09:36:37 12 all.

09:36:37 13 Q. It's just global markets?

09:36:39 14 A. It's global markets.

09:36:40 15 Q. When the salesperson at global markets made  
09:36:46 16 the sale to VA Hospital, what did he or she do next to  
09:36:51 17 notify people inside global markets? You mentioned -- I  
09:36:54 18 missed the step where a CC got involved.

09:36:57 19 A. Okay. Once the sale is made, they send a sold  
09:37:02 20 notice to NSS to notify them that that case has been  
09:37:07 21 sold. They notify them with a program manager request  
09:37:13 22 to the appropriate program manager's boss, which there  
09:37:17 23 are several of those, but it has to go to my boss and  
09:37:21 24 she will delegate it to who it will be assigned to. If  
09:37:24 25 it's in Houston that's me, right now.



09:37:27 1 Q. Inside global markets?

09:37:28 2 A. Right.

09:37:29 3 Q. Okay.

09:37:29 4 A. They send it to her and -- in this case, and

09:37:34 5 from there she routes it back to me, and then it's

09:37:38 6 between -- and she notifies NSS also, at the same time,

09:37:43 7 that I'm the project manager, and from that point, it's

09:37:47 8 up to NSS to get all the paperwork together before they

09:37:50 9 have the hand-off meeting to finalize that, because up

09:37:55 10 until now they have not finalized all the details.

09:37:59 11 Q. Okay. Now, you guys -- you're already -- I'm

09:38:02 12 trying to approach it chronologically. You're already

09:38:05 13 talking about a kick-off meeting to augment the network,

09:38:09 14 but no one has actually placed the order through the

09:38:11 15 front door yet, right?

09:38:12 16 A. No.

09:38:12 17 Q. No, that's not right?

09:38:14 18 A. Well, okay.

09:38:15 19 Q. Or yes, I'm correct?

09:38:16 20 A. There's no orders issued yet at this time, no.

09:38:21 21 Q. So you've looked at this contract and between

09:38:24 22 you and NSS you guys understand that some type of

09:38:27 23 build-out is going to be needed?

09:38:28 24 A. Based on the sold notice when I see it, yes.

09:38:32 25 Q. Okay. And at some point --

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09:38:34 1 A. I'll clarify. I sometimes don't know what  
09:38:37 2 they're ordering until I see that notice.

09:38:39 3 Q. Okay. Now, how --

09:38:42 4 A. Or the project manager request. Sometimes the  
09:38:47 5 sold notice isn't very clear to me. It says a case has  
09:38:50 6 been sold, where the PM requests actually have a  
09:38:54 7 description of what's been sold. And until I get it, I  
09:38:59 8 won't notice it until they say, hey, you're the project  
09:39:02 9 manager, and I'll send you the details. But usually it  
09:39:05 10 works the right way.

09:39:08 11 Q. Before we move forward, at that point, how did  
09:39:11 12 you know that a build-out was going to be needed, that  
09:39:14 13 facilities were not in place?

09:39:14 14 A. Only because the PM request had been made.

09:39:16 15 Q. But still, how did you know what facilities  
09:39:21 16 were out there by the VA Hospital?

09:39:21 17 A. I wouldn't. I'm not in that same -- I'm not  
09:39:23 18 in that department to determine that.

09:39:25 19 Q. Is that NSS's call?

09:39:27 20 A. That's NSS's call now and their counterparts  
09:39:31 21 they deal with.

09:39:31 22 Q. So NSS somehow communicated to you at some  
09:39:36 23 point that a build-out was going to be needed for the VA  
09:39:39 24 Hospital?

09:39:39 25 A. They would just indicate that -- they would

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09:39:40 1 come to me and say what day will be convenient for me to  
09:39:44 2 have a conference call for this meeting.

09:39:46 3 Q. Okay.

09:39:46 4 A. And at some point in that time they would give  
09:39:50 5 me a copy of what they're working on so at least I'll  
09:39:53 6 have an idea.

09:39:55 7 Q. And at what point did you make the decision to  
09:40:04 8 place an order with ASI?

09:40:10 9 A. Usually about the time when they -- either the  
09:40:14 10 fiber is spliced and tested or when we have equipment  
09:40:19 11 being delivered to the premise so that I can determine  
09:40:25 12 the real interval for that order.

09:40:27 13 Q. Let me back up. Explain to me why you get ASI  
09:40:31 14 involved.

09:40:34 15 A. Because I can't generate that order back to  
09:40:36 16 their equipment.

09:40:39 17 Q. ASI's equipment is involved in this?

09:40:41 18 A. Their network, their frame relay or their cell  
09:40:44 19 relay or their internet service.

09:40:47 20 Q. Okay.

09:40:48 21 A. So we have to order it from them. It could be  
09:40:52 22 either a -- we could be meeting them or we could be  
09:40:55 23 going to them. In either case, it -- they have to issue  
09:40:58 24 the order to tell us where to meet them or for the order  
41:03 25 to come to the customer, whichever the case may be.

09:41:22 1 Q. So ASI will provide the frame relay or the ATM  
41:28 2 or whatever else is involved, but they'll do it over  
09:41:32 3 SWBT's transport network?

09:41:32 4 A. Right. CPC will assign it over there once the  
09:41:39 5 order comes in.

09:41:51 6 Q. So the VA Hospital, that was also a frame  
09:41:54 7 relay deal or an ATM deal? I thought you said it was  
09:41:59 8 just some circuits.

09:42:00 9 A. It was one ATM and three internet -- three or  
09:42:03 10 four internet circuits, DS4, I think.

09:42:08 11 Q. And an internet circuit just being like a DS1  
09:42:12 12 or a DS3?

09:42:13 13 A. Yes, four DS1s and one DS3 in effect.

09:42:19 14 Q. So those are just simple -- it doesn't matter  
09:42:21 15 what travels over them, they're just normal circuits?

09:42:24 16 A. We hand it to them and they do the mapping.

09:42:27 17 Q. Now, did -- for the VA Hospital, did you order  
09:42:30 18 just the ATM through ASI or did you order all the  
09:42:33 19 circuits through ASI?

09:42:34 20 A. All of them had to be ordered.

09:42:36 21 Q. And explain to me why that is.

09:42:39 22 A. Because they're going to the internet cloud,  
09:42:42 23 which we kind of call the cloud, which is somewhere in  
09:42:45 24 the central office that I have no control of. It's a  
42:49 25 meet point.

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09:42:49 1 Q. Right.

09:42:50 2 A. It's -- they're controlling it beyond that  
09:42:53 3 point, whether it's a virtual, physical, whatever, the  
09:42:57 4 cage or whatever the termination may be. So once I go  
09:43:01 5 beyond that, we have to go through ASI and have them  
09:43:05 6 issue the order.

09:43:10 7 Q. So global markets at the VA Hospital got a  
09:43:14 8 contract signed where they were selling the VA an ATM  
09:43:17 9 circuit and three to four internet circuits with  
09:43:20 10 internet service to the internet cloud?

09:43:23 11 A. Correct.

09:43:25 12 Q. And to provision that, they hired ASI --  
09:43:31 13 effectively hired ASI to do that?

09:43:33 14 A. Yes.

09:43:34 15 Q. So ASI then placed those orders through the  
09:43:38 16 ASC?

09:43:38 17 A. Correct.

09:43:41 18 Q. And I don't want to get bogged down in how the  
09:43:44 19 order went through, but with the order going through  
09:43:47 20 SWBT starting with the ASC and going through, in  
09:43:51 21 addition to your discussions with NSS, a determination  
09:43:55 22 was made that additional build-out to the SWBT fiber  
09:44:02 23 network was going to be required?

09:44:06 24 A. The -- the network has to be to a point where  
44:10 25 CPC can post and issue the orders. In other words,

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09:44:16 1 this -- NSS at the time those orders are issued is far  
09:44:19 2 out of the picture.

09:44:20 3 Q. Correct. So -- but back on the front end, ASI  
09:44:26 4 is ordering this one ATM circuit?

09:44:31 5 A. Not until we ask them to. That's what I said  
09:44:34 6 before.

09:44:34 7 Q. Right. We are --

09:44:36 8 A. I'm saying --

09:44:38 9 Q. You placed it through ASI. ASI now officially  
09:44:42 10 places the order through the ASC?

09:44:44 11 A. Right.

09:44:44 12 Q. And are they ordering circuits or are they  
09:44:48 13 ordering the one -- the ATM and internet circuits?

09:44:51 14 A. They're ordering those circuits.

09:44:51 15 Q. Or are they providing --

09:44:54 16 A. Circuits only.

09:44:55 17 Q. So really they're just ordering circuits only?

09:44:57 18 A. Right.

09:44:58 19 Q. They are going to put transmission protocols  
09:45:02 20 and internet service over the circuits themselves, but  
09:45:05 21 when ASI -- ASI is just ordering simple circuits?

09:45:10 22 A. Right.

09:45:11 23 Q. And when that order went through, at some  
09:45:12 24 point it was determined by SWBT that an additional SONET  
09:45:15 25 ring was going to be needed to handle this ASI order?

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09:45:19 1 A. Right.

09:45:19 2 Q. And at that point NSS was involved, correct?

09:45:23 3 A. Right.

09:45:24 4 Q. And you were involved, correct?

09:45:25 5 A. Right.

09:45:26 6 Q. And you got involved with the ASI project

09:45:29 7 manager, correct?

09:45:30 8 A. Yes.

09:45:30 9 Q. And SWBT technicians were able to build out

09:45:37 10 that SONET ring to provision the circuits that ASI had

09:45:43 11 ordered?

09:45:43 12 A. Correct.

09:45:48 13 Q. Why didn't SWBT just say, sorry, ASI, these

09:45:52 14 circuits are not available? There's no facilities

09:45:55 15 available?

09:45:55 16 A. To ASI -- because it's a global sale.

09:45:59 17 Q. Okay.

09:46:00 18 A. Global markets is issuing the orders, but

09:46:04 19 since it's going to a cloud, we have to go through ASI

09:46:08 20 and ask them.

09:46:09 21 Q. So it was understood internally that even

09:46:11 22 though ASI was making the order that this was a group

09:46:15 23 SBC project and, therefore, it would be -- build-outs

09:46:20 24 would be made if necessary?

46:22 25 MR. HARTLEY: Object to form.

09:46:23 1 A. Yes.

09:46:25 2 Q. Okay. Did SWBT start to build out for the  
09:46:34 3 network for ASI in advance of ASI issuing the order for  
09:46:39 4 service?

09:46:40 5 A. Yes.

09:47:08 6 MR. CRAWFORD: Give me just a second,  
09:47:09 7 Mr. Johnson.

09:47:21 8 THE WITNESS: Can we take about a  
09:47:23 9 five-minute break?

09:47:24 10 MR. CRAWFORD: Sure.

09:47:25 11 (Recess 9:47 to 9:53 a.m.)

09:53:22 12 Q. Okay. We are wrapping up the discussion,  
09:53:25 13 Mr. Johnson, of the time you worked with ASI on the VA  
09:53:32 14 Hospital issue.

09:53:33 15 A. Correct.

09:53:34 16 Q. One final question on the VA Hospital. Do you  
09:53:36 17 recall whether or not in that instance ASI had submitted  
09:53:41 18 its purchase for those circuits as a UNE or not?

09:53:45 19 A. I don't know.

09:53:46 20 Q. Or special access or -- do you know how they  
09:53:50 21 were buying that circuit -- those circuits?

09:53:59 22 A. I don't know. I don't know what they were on  
09:54:00 23 that.

09:54:00 24 Q. How does SWBT bill ASI; at what rate?

54:04 25 A. That, I don't know. I'm not on the -- I don't



09:54:07 1 see the billing.

54:09 2 Q. Okay. You don't know -- you've never heard  
09:54:12 3 whether ASI buys on a UNE basis or other basis?

09:54:19 4 A. My recollection is that they do, but I can't  
09:54:22 5 say what was sold in this case.

09:54:32 6 Q. Okay. You mentioned five to ten projects in  
09:54:36 7 which you've worked with ASI. What's another good  
09:54:41 8 example?

09:54:41 9 MR. HARTLEY: Object to form.

09:54:43 10 Q. What's another one of those five to ten  
09:54:46 11 projects?

09:54:53 12 A. Let me think a minute. Let's see. I may have  
09:55:11 13 to correct myself, it may be under five, but it depends  
:55:15 14 on how you count. Let's see. Let me think.

09:55:41 15 I'd have to back off. I said five to  
09:55:44 16 ten. I probably -- it should have been less than five.

09:55:47 17 Q. Okay.

09:55:51 18 A. The -- the two has been basically VA and that  
09:55:57 19 other one for EPGN, that I can remember right now.

09:56:02 20 Q. Okay. And EPGN -- EPGN ordered a bunch of --  
09:56:11 21 was it frame relay or --

09:56:13 22 A. Frame relay.

09:56:16 23 Q. Frame relay circuits which involved getting  
09:56:18 24 free frame relay service over DS1s to their various colo  
56:26 25 cages at the Southwestern Bell Telephone Company COs.

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09:56:32 1 correct?

09:56:32 2 A. Right.

09:56:32 3 Q. When the global markets' person made that

09:56:35 4 sale, what happened next?

09:56:40 5 A. He requested project management to be involved

09:56:43 6 because it was such a large project.

09:56:45 7 Q. And that was global markets' project

09:56:49 8 management?

09:56:50 9 A. Right.

09:56:51 10 Q. Your group?

09:56:51 11 A. My group.

09:56:52 12 Q. Okay.

09:56:53 13 A. Which was at the time all T1s and one DS3 back

09:57:01 14 to their main location, which all facilities exist.

09:57:11 15 Q. All DS1s existed?

09:57:13 16 A. No. I'm saying the facilities for them would

09:57:15 17 have existed within the -- in the -- available to be

09:57:19 18 assigned if they -- when they ordered them. There was

09:57:22 19 no construction involved in this project at all.

09:57:24 20 Q. Okay. In that case, why was project

09:57:27 21 management requested?

09:57:28 22 A. Because of the largeness of it.

09:57:30 23 Q. Just making sure that --

09:57:32 24 A. Coordination only.

09:57:33 25 Q. So once you were involved, what did you do?

09:57:37 1 A. We have had a few meetings with the account  
09:57:43 2 manager, DSS, CC -- the DSS being the technical support  
09:57:49 3 person, the CC, and one -- one or two of the EPGN  
09:57:56 4 employees downtown --

09:57:58 5 Q. Okay.

09:57:59 6 A. -- to discuss what they -- what they were  
09:58:01 7 required to give to us.

09:58:07 8 Q. And then -- what point did you involve ASI?

09:58:11 9 A. Have not yet.

09:58:16 10 Q. Well, we started -- the question I asked you,  
09:58:21 11 Mr. Johnson, earlier was how often you had worked with  
09:58:25 12 ASI on these project management issues, and you said  
09:58:27 13 there have been five to ten projects, and now you're  
09:58:31 14 saying there was only one?

09:58:32 15 A. Well, this project is a large one that we will  
09:58:37 16 involve ASI when we get the information from the  
09:58:41 17 customer to order the ASI project.

09:58:43 18 Q. Okay.

09:58:44 19 A. There is an ASI project manager available, but  
09:58:49 20 he cannot do anything until we submit the order.

09:58:52 21 Q. And what order will you submit to him?

09:58:54 22 A. The 115 T1s.

09:58:59 23 Q. And what is ASI going to do with them, if they  
09:59:03 24 follow normal procedures?

09:59:04 25 A. Issue 115 orders.

09:59:07 1 Q. So ASI will then issue an order for 115 T1s to  
09:59:12 2 the access service center?

09:59:14 3 A. Right, at whatever we tell them, that rate,  
09:59:17 4 we'll coordinate the dates, but they may -- but, yes,  
09:59:21 5 over a period of time, we should get 115, whatever --  
09:59:25 6 whatever the number is. I know --

09:59:32 7 Q. How do you handle the rate issue?

09:59:35 8 A. The rate?

09:59:41 9 Q. Right.

09:59:42 10 A. You're talking about the interval or --

09:59:44 11 Q. Are you going to order -- do you order through  
09:59:47 12 ASI?

09:59:47 13 A. Yes. Again, it's all -- well, the CC, again,  
09:59:53 14 will request -- will make those orders based on EPGN  
09:59:58 15 telling us which ones they want issued in which order.

10:00:02 16 Q. Okay.

10:00:03 17 A. And to which --

10:00:04 18 Q. So the communications consultant for global  
10:00:08 19 markets will, if he follows normal procedures, make the  
10:00:13 20 order for 115 T1s to ASI?

10:00:16 21 A. Right.

10:00:16 22 Q. Now, that's not a situation where ASI is going  
10:00:19 23 to have to -- you'll pay ASI money or ASI will pay you  
10:00:24 24 money, is it?

00:25 25 A. I don't know. That, I don't know.

10:00:29 1 Q. Then ASI orders them through the access  
10:00:32 2 service center?

10:00:32 3 A. Correct.

10:00:32 4 Q. And then they'll be provisioned?

10:00:34 5 A. Right.

10:00:35 6 Q. Okay. And no -- you don't suspect any  
10:00:40 7 facilities will need to be billed for that?

10:00:43 8 A. So far I don't look for anything to be billed.

10:00:47 9 Q. Now, with 115 T1s, at a minimum, I would  
10:00:54 10 imagine you would expect that at some point electronics  
10:00:59 11 are going to have to be swapped out to make sure you've  
10:01:02 12 got a DS1 drop at every port you needed, right?

10:01:08 13 A. Again, I would not be -- that's all ASI.

10:01:11 14 Q. I understand, but what are the odds of there  
10:01:16 15 being DS1 ports available at all 115 locations right  
10:01:20 16 where you need them?

10:01:23 17 A. That's hard to tell until the orders flow  
10:01:27 18 through the system.

10:01:27 19 Q. Based on your experience, what are the odds of  
10:01:29 20 that happening, Mr. Johnson?

10:01:32 21 A. Since it's within the CO, they're probably  
10:01:35 22 there.

10:01:35 23 Q. Probably there?

10:01:36 24 A. Yes. If ASI has provisioned them. I don't  
01:40 25 know how they provision them.

10:01:42 1 Q. Well, is it ASI's network or is it your  
01:45 2 network?

10:01:46 3 A. It's theirs.

10:01:48 4 Q. Then why are they ordering the circuits  
10:01:51 5 through SWBT?

10:01:51 6 A. Because it will have to come over to the EPGN  
10:01:54 7 cage.

10:01:57 8 Q. Okay. So are they just ordering cross  
10:02:00 9 connects or are they ordering the DS1s?

10:02:03 10 A. They're ordering the DS1s.

10:02:06 11 Q. And the DS1s are going to connect the EPGN and  
10:02:14 12 colocation cage to what?

10:02:14 13 A. To the ASI colocation cage -- or Southwestern  
:02:15 14 Bell meet point for ASI.

10:02:18 15 Q. Which would be ASI's colocation cage?

10:02:20 16 A. Yes. It would be basically going from meet  
10:02:23 17 point to meet point is all it is.

10:02:25 18 Q. All right. So presumably -- and we sit -- is  
10:02:31 19 it 115 COs we are talking about?

10:02:33 20 A. Yes, more or less.

10:02:34 21 Q. In 115 COs, ASI has a meet point in every one  
10:02:39 22 of those COs?

10:02:42 23 A. Don't know, because I don't have all the list  
10:02:44 24 of these -- the COs that EPGN wants to go to.

02:48 25 Q. Okay.

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10:02:49 1 A. They haven't --

10:02:51 2 Q. It's a general practice for ASI to have a meet  
10:02:54 3 point in every CO, as a general policy matter?

10:02:57 4 A. Not necessarily.

10:02:59 5 Q. There's a number of COs that ASI does not have  
10:03:02 6 a meet point in?

10:03:03 7 A. I would say yes.

10:03:06 8 Q. Okay. When they do have a meet point, what  
10:03:08 9 structure do they use?

10:03:14 10 A. The -- explain that a little bit more.

10:03:17 11 Q. Do they have a physical colocation cage, a  
10:03:21 12 virtual colocation setup?

10:03:22 13 A. I don't know.

10:03:23 14 Q. Do they just lease a MUX, lease a line or  
10:03:27 15 what?

10:03:28 16 A. I couldn't tell you on theirs what theirs  
10:03:30 17 looks like. There's too many variations in that.

10:03:34 18 Q. Do you know any?

10:03:36 19 A. I don't know what they physically look like.

10:03:39 20 Q. But just the general set-up?

10:03:41 21 A. No, I don't.

10:03:42 22 Q. You don't know what --

10:03:44 23 A. I don't know what they look like. I know when  
10:03:45 24 I see the name, I know it's theirs. What it is, I don't  
03:50 25 know.

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10:03:50 1 Q. In terms -- okay, but not on any specific CO.  
10:03:55 2 I'm just saying, do you know -- have you ever heard any  
10:04:00 3 type of configuration that ASI uses for their meet  
10:04:04 4 point?

10:04:06 5 A. I'm not comfortable to repeat it.

10:04:09 6 Q. Well --

10:04:10 7 A. I mean, I don't -- it's too much variation in  
10:04:14 8 the network to how these were built out.

10:04:17 9 Q. Right. Just give me one example. I'm not  
10:04:19 10 going to ask for all the examples, but one example that  
10:04:23 11 you've heard about.

10:04:24 12 A. Most parts of colocation. I mean, it's a  
10:04:27 13 virtual -- I mean, not virtual, but a physical area  
10:04:31 14 within the CO.

10:04:32 15 Q. Where they have their own box?

10:04:33 16 A. Yes, or a DSX panel or equipment. It's --  
10:04:42 17 it's -- as far as I'm concerned, it's just a meet --  
10:04:44 18 it's a DSX or a meet point.

10:04:52 19 Q. What's a DSX?

10:04:54 20 A. Digital cross connect or -- it's a DS1 or DS3  
10:05:03 21 manual cross connect patch panel.

10:05:22 22 Q. Where do they keep their frame relay  
10:05:24 23 equipment, ASI?

10:05:26 24 A. I don't know.

05:27 25 Q. I mean, do you know if it's in the CO or not?

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10:05:30 1 MR. HARTLEY: Object to form.

10:05:31 2 A. I don't know.

10:05:35 3 Q. Have you ever heard of any facilities that ASI

10:05:39 4 has that are not in SWBT COs?

10:05:42 5 A. That I can't tell you. I don't know.

10:05:44 6 Q. Does ASI own fiber out in the field?

10:05:47 7 A. No.

10:05:48 8 Q. How does ASI get its fiber out in the field?

10:05:52 9 A. I'm not on that side of the -- I don't work

10:05:55 10 for them, so I don't know how they do their business.

10:06:00 11 Q. Well, I mean, is it your understanding -- you

10:06:02 12 know the network. You understand the fiber in the

10:06:05 13 ground, you understand the fiber configuration in the

10:06:09 14 ground. Does ASI travel over SWBT fiber?

10:06:11 15 A. They can if that's the way the facility was

10:06:13 16 designed, but that doesn't exclude them using

10:06:18 17 whatever -- whatever path they have. I don't know what

10:06:20 18 they build out. That's all transparent to me.

10:06:26 19 Q. I mean, if they need something, they'll order

10:06:29 20 it through SWBT and SWBT will take care of the

10:06:31 21 build-out, correct?

10:06:32 22 A. Normally.

10:06:33 23 Q. And you don't know how -- what they're paying

10:06:36 24 SWBT for that build-out or how that side of the house

25 works?

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